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Office of the Secretary
Federal Communications Commission
Washington DC 20554
United States of America

FCC MAIL ROOM

DEC 13 1996

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Your ref: FCC 96-375
Our ref: LJ/ 60417
Date: 10 December 1996

Dear Sir,

WT Docket No. 96-188

I refer to the above document relating to the amendment of the amateur service rules to authorise visiting foreign amateur stations in the United States. I am commenting on behalf of the European Radiocommunications Office of the CEPT.

On behalf of the CEPT and European radio amateurs I would like to assure you that the efforts to progress this matter are highly appreciated. Concerning the document I have the following comments:

Page 1 Introduction and Executive Summary

The correct number of European countries that have implemented CEPT Recommendation T/R 61-01 with respect to visitors from non-CEPT countries is 28. (see the attached list).

Page 3 First section and note 5

The number of CEPT countries that have implemented the Recommendation is 29. One of these countries has restricted implementation to CEPT countries.

The total number of CEPT members is at this moment 43.

The number of non-CEPT countries that are participating in the arrangement is at the moment four. Canada recently joined.

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You indicated that it is expected that the agreement will be concluded this year. I assume 1997 is meant here, since the procedure might take some months. For information I have enclosed the procedure that is followed within the CEPT.

With regard to note 5, I like to point out that the information given for France and United Kingdom may not be correct. France participates for France, Corsica, Guadeloupe, Guiana, Martinique, St-Bartholomew, St-Pierre/Miquelon, St-Martin and Réunion/Dependencies and the United Kingdom for Great-Britain, Northern Ireland, the Channel Islands and the Isle of Man.

Page 5 section 8

I agree with your conclusion that visiting radio amateurs with a CEPT licence can be assumed to operate amateur stations properly during short term visits, based upon the licences from their own countries. This assumption is the basis on which the CEPT Recommendation has been formulated.

Regarding your definition of short-term visits I would like to point out that purposely the CEPT Recommendation provides no definition of short visits. This is in order that the system may be kept as flexible as possible. There is a common understanding however that the period is around 3 months for a single visit. In case of longer visits or stays of a couple of years, it is possible to apply T/R 61-02, which makes it possible to issue a licence in the visited country based on the examination passed in the home country, when this examination is in compliance with T/R 61-02. It is also possible for non-CEPT administrations to participate in this procedure.

Regarding your proposed definition of short term visits, I consider this definition to be a bit complicated and would favour no definition or alternatively 3 or 4 months per year.

Page 6 section 10

On the proposals in this section, I would like to comment that the CEPT Recommendation requires the following provisions to be included in the licence of the radio amateur or alternatively in a separate document. The licence or separate document has to be drafted in English, French and German.

- a declaration according to which the holder is authorised to utilise his amateur radio station in accordance with this Recommendation in countries where the latter applies;
- the name and address of the holder;
- the call sign;
- the CEPT licence class;
- the validity;
- the issuing authority.

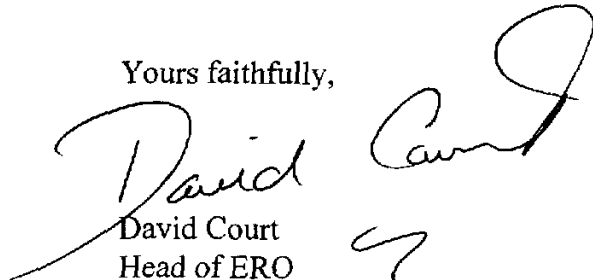
Page 6/7 section 11

The proposals laid down in this section are in good order, although I would like to again mention the possibility of applying T/R 61-02 providing for the recognition of examination standards as indicated in this Recommendation. See my comments on section 8.

Page 7 section 12

It is not possible to comment on the proposals concerning which U. S. classes will be covered by CEPT classes I and II, without having studied the applicable examination syllabi. According to the procedures which I have annexed, the U.S. should make proposals which I will circulate to CEPT administrations with a recommendation concerning their acceptability.

Yours faithfully,


David Court
Head of ERO

**INFORMATION ON THE PARTICIPATION OF NON-CEPT
ADMINISTRATIONS IN THE
CEPT RADIO AMATEUR LICENSING SYSTEM ACCORDING TO
THE RECOMMENDATIONS T/R 61-01 AND T/R 61-02**

0. INTRODUCTION

The Recommendation T/R 61-01, originally approved in 1985, opened the possibility for radio amateurs from CEPT countries to operate during short visits in other CEPT countries without obtaining an individual temporary licence from the visited CEPT administration.

At this moment 28 CEPT administrations have implemented the Recommendation (see Annex).

Good experience with this system was gained since it proved to lessen the administrative formalities for both amateurs and administrations considerably and in 1992 it was decided to open the possibility for non-CEPT countries to participate in this licensing system.

Up to now -November 1996- Canada, Israel, New Zealand and Peru have joined the arrangements.

T/R 61-02, originally approved in 1990, introduced harmonised radio amateur examination levels on the basis of which CEPT administrations could issue a Harmonised Amateur Radio Examination Certificate (HAREC), which would be mutually recognised by the participating administrations.

At this moment 18 CEPT administrations have implemented the Recommendation (see Annex).

Also with this system good experience was gained for the same reasons as mentioned above and in February 1994 it was decided to open the possibility for non-CEPT administrations to participate.

At this moment no non-CEPT administration has yet applied for participation.

In this document information is given on the procedure that is followed, when applications from non-CEPT administrations are received.

1. APPLICATION

- 1.1. Administrations, not being members of CEPT, may apply to participate in the CEPT arrangements for harmonised Amateur Radio Licensing systems regulated by the Recommendations T/R 61-01 and T/R 61-02. Applications shall be sent to the CEPT European Radiocommunications Office (ERO) in Copenhagen (address Midtermolen 1, DK-2100 Copenhagen, Denmark).

The information needed to support an application shall include: a list of licence classes in the country concerned, their privileges and the proposed CEPT licence class or examination level equivalents.

Details of national examination syllabuses or documents describing the requirements of the national licence classes and their privileges shall be enclosed with the application. All the details mentioned above must be submitted in one of the official languages of the CEPT (English, French or German).

2. APPLICATION PROCEDURES

- 2.1. The ERO shall circulate the application to all CEPT ERC Member Administrations indicating the compliance of the application with the requirements of the Recommendation concerned. If necessary, the ERO shall seek advice from individual experts from CEPT Member Administrations.**

The ERO shall also include a recommendation concerning the approval to be given. This recommendation should normally be given within six months of the date of application. If the assessment of the application cannot be completed within this time, the ERO shall provide a report concerning the status of the application to the applicant and CEPT member Administrations

- 2.2. CEPT Administrations will, within a period of four weeks, notify to the ERO their agreement or disagreement with the proposal; this message shall also include, if so required by the Administration concerned, the need for a separate bilateral agreement with the applying Administration concerning the implementation of the Recommendation concerned.**

CEPT Administrations may indicate their wish to have the application studied by a Project Team to be established by the Chairman of Working Group RR.

- 2.3. CEPT Administrations, which have implemented the Recommendation concerned and have not replied within the time limit set in para 2.2 will be assumed to have accepted the application.**
- 2.4. The ERO will inform the Administration of the applying non CEPT country on the results of the consultation.**
- 2.5. The list of those countries which implemented the Recommendation concerned will be based on the information contained in the document: "Implementation of T/R Recommendations"**
- 2.6. The ERO will inform the CEPT Administrations on the result of the consultation. If the application is accepted, the ERO shall also update the relevant annexes to the Recommendation.**

ANNEX

ADMINISTRATIONS THAT HAVE IMPLEMENTED T/R 61-01 AND/ OR T/R 61-02.

9 December 1996

T/R 61-01

Austria
Belgium
Bulgaria
Croatia
Cyprus
Czech Republic
Denmark
Estonia
Finland
France
Germany
Hungary
Iceland
Ireland
Italy
Latvia
Liechtenstein
Luxembourg
Monaco¹
Netherlands
Norway
Portugal
Romania

Slovak Republic
Spain²
Sweden
Switzerland
Turkey
United Kingdom

T/R 61-02

Bulgaria
Croatia

Czech Republic
Denmark

Finland

Germany
Hungary

Ireland

Latvia?
Liechtenstein

Netherlands
Norway
Portugal
Romania
Poland

Canada, New Zealand, Israel, Peru

At present , additional bilateral agreements are necessary with Greece with regard to
T/R 61-01 and T/R 61-02 (except for EEA countries).